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Attorney for Plaintiff,
Cleveland Vickers

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

CLEVELAND VICKERS,) No. 2:21-cv-00732-JAM-KJN
Plaintiff,)
vs.)
DANCE UNLIMITED, LLC dba DANCE)
UNLIMITED, et al.,)
Defendants.)
STIPULATION GRANTING PLAINTIFF
LEAVE TO FILE FIRST AMENDED
COMPLAINT; ORDER

IT IS HEREBY STIPULATED by and between Plaintiff, Cleveland Vickers (“Plaintiff”), and Defendants, Dance Unlimited, LLC dba Dance Unlimited and Natalia Clarke, Trustee of the Natalia Clarke Family Trust, U/A dated January 27, 2009 (collectively “Defendants,” and together with Plaintiff, the “Parties”), the parties hereto, through their respective attorneys of record, that Plaintiff may file a First Amended Complaint, a copy of which is attached hereto as Exhibit “A.” This amendment will not modify any date or deadline fixed by the Court’s Scheduling Order dated November 30, 2021 (Dkt. 23) pursuant to Fed. R. Civ. P. 16(b)(4), and is not prejudicial to Defendants, the product of undue delay, proposed in bad faith, or futile.

IT IS FURTHER STIPULATED that Plaintiff will file his First Amended Complaint within five (5) calendar days of the Court's Order permitting such filing, and that Defendants'

**STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT;
ORDER**

1 response thereto shall be filed within fourteen (14) days after the First Amended Complaint is
2 filed.

3 **IT IS SO STIPULATED.**

4 Dated: April 7, 2022

MOORE LAW FIRM, P.C.

6 */s/ Tanya E. Moore* _____

7 Tanya E. Moore
Attorney for Plaintiff,
Cleveland Vickers

8 Dated: April 7, 2022

9 VAUGHAN & ASSOCIATES LAW OFFICE, APC

10 */s/ Cris V. Vaughan* _____

11 Cris V. Vaughan
Khushpreet R. Mehton
12 Attorneys for Defendants,
13 Dance Unlimited, LLC dba Dance Unlimited and
14 Natalia Clarke, Trustee of the Natalia Clarke
Family Trust, U/A dated January 27, 2009

15 **ORDER**

17 The Parties having so stipulated and good cause appearing,

18 **IT IS HEREBY ORDERED** that Plaintiff shall file his First Amended Complaint, a
19 copy of which was filed with the Parties' stipulation, within five (5) calendar days of the date
20 this Order is filed.

21 **IT IS FURTHER ORDERED** that Defendants' response thereto shall be filed within
22 fourteen (14) days after the First Amended Complaint is filed.

24 **IT IS SO ORDERED.**

26 Dated: April 8, 2022

27 */s/ John A. Mendez* _____

28 THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE

STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT;
ORDER